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7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**

9 JANE DOE, an Individual,

10 Plaintiff,

11 vs.

12 CITY OF LAS VEGAS, CITY OF
13 HENDERSON, NATHAN HANNIG, an
14 Individual, MARIO RUEDA, an Individual,
15 RUBEN SANCHEZ, an Individual, JAMES
16 SUAREZ, an Individual, JONATHAN
17 CUFF, an Individual, JOSEPH “JOE”
18 VANEK, an Individual,
19 JAROD BARTO, an Individual, CODY
20 RACINE, an Individual JASON TULLIS,
21 an Individual, and ZACH YEOMAN, an
22 Individual, WILLIAM MCDONALD, an
23 Individual, and as an Individual, JON
24 STEVENSON, an Individual, JOHN DOE
25 #1, likely an Individual, DOES I -X; ROE
26 CORPORATIONS I -X.

27 Defendants.

1 CASE NO.: 2:19-cv-00382-GMN-BNW

2 **STIPULATION AND ORDER TO EXTEND THE TIME FOR PLAINTIFF TO**
3 **RESPOND TO DEFENDANTS’ MOTION TO DISMISS**
4 **(FIRST REQUEST)**

5 COMES NOW, the Plaintiff, JANE DOE (“Jane”), by and through her attorney, JENNY
6 L. FOLEY, Ph.D., ESQ., of the law firm HKM EMPLOYMENT ATTORNEYS LLP, and

1 Defendant, CITY OF LAS VEGAS, (“City of Las Vegas”), by and through their attorney,
2 JACK ESLINGER, ESQ., of THE LAS VEGAS CITY ATTORNEY’S OFFICE, Defendant,
3 CITY OF HENDERSON, (“City of Henderson”), by and through their attorney, BRIAN R.
4 REEVE, ESQ., of CITY OF HENDERSON CITY ATTORNEY’S OFFICE, Defendant,
5 NATHAN HANNING, (“Nathan”) an Individual, by and through his attorney, DEANNA L.
6 FORBUSH, ESQ., of MORRIS, POLICH & PURDY LLP, Defendant, MARIO RUEDA,
7 (“Mario”) an Individual, by and through his attorney, ADAM M. LEVINE, ESQ., of LAW
8 OFFICE OF DANIEL MARKS, LTD., Defendant, RUBEN SANCHEZ, (“Ruben”) an
9 Individual, by and through his attorney, JACK O’ESLINGER, ESQ., of THE LAS VEGAS
10 CITY ATTORNEY’S OFFICE, Defendant, JAMES SUAREZ, (“James”) an Individual, by and
11 through his attorney, JACK O’ ESLINGER, ESQ. of THE LAS VEGAS CITY ATTORNEY’S
12 OFFICE, Defendant, JONATHAN CUFF, (“Jonathan”) an Individual, by and through his
13 attorney, JACK O’ ESLINGER, ESQ. of THE LAS VEGAS CITY ATTORNEY’S OFFICE,
14 Defendant, JOSEPH “JOE” VANEK, (“Joe”) an Individual, by and through his attorney, JACK
15 O’ ESLINGER, ESQ. of THE LAS VEGAS CITY ATTORNEY’S OFFICE, Defendant,
16 JAROD BARTO, (“Jarod”) an Individual, by and through his attorney, MARC P. COOK, ESQ.,
17 of COOK AND KELESIS, LTD., Defendant, CODY RACINE, (“Cody”) an Individual, by and
18 through his attorney, CHRISTIAN JAMES GABROY, ESQ., of GABROY LAW OFFICES,
19 Defendant, JASON TULLIS, (“Jason”) an Individual, by and through his attorney, ADAM M.
20 LEVINE, ESQ., of LAW OFFICE OF DANIEL MARKS, LTD., Defendant, ZACH
21 YEOMAN, (“Zach”) an Individual, by and through his attorney, ADAM M. LEVINE, ESQ.,
22 of LAW OFFICE OF DANIEL MARKS, LTD., Defendant, WILLIAM McDONALD,
23 (“William”) by and through his attorney, JACK O’ ESLINGER, ESQ. of THE LAS VEGAS
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1 CITY ATTORNEY'S OFFICE, Defendant, JON STEVENSON, ("Jon") an Individual, by and
2 through his attorney, JACK O' ESLINGER, ESQ. of THE LAS VEGAS CITY ATTORNEY'S
3 OFFICE, JOHN DOE #1, likely an Individual and hereby stipulate and agree as follows:
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5 1. That the Response to the Defendants' Motions to Dismiss that are due on June
6 5, 2019; June 11, 2019 and June 14, 2019 collectively, and from the office of Daniel Marks,
7 Ltd., Gabroy Law Offices and Cook and Kelesis, Ltd., will now be due on June 21, 2019.

8 2. That the Reply to the Response to the Defendant's Motions to Dismiss shall be
9 due July 12, 2019.

10 3. This request for an extension of time is made in good faith and not for purpose of
11 delay. This is the first request for an extension of time with respect to the Reply and Responses
12 associated with Defendants' Motions.
13

14 Dated this 7th day of June, 2019.

Dated this 7th day of June, 2019.

15 **HKM Employment Attorneys LLP**

Law Office of Daniel Marks, Ltd.

17 /s/ Jenny Foley
18 Jenny L. Foley, Ph.D., Esq.
19 Nevada Bar No. 9017
20 1785 East Sahara Ave., Suite 300
Las Vegas, Nevada 89104

/s/ Adam M. Levine
Adam M. Levine, Esq.
Nevada Bar No. 4673
610 South Ninth Street
Las Vegas, Nevada 89101

21 Dated this 7th day of June, 2019.

Dated this 7th day of June, 2019.

23 **Gabroy Law Offices**

Cook and Kelesis, Ltd.

25 /s/ Christian J. Gabroy
26 Christian J. Gabroy, Esq.
Nevada Bar No. 8805
27 170 South Green Valley Parkway
Henderson, Nevada 89012

/s/ Marc P. Cook
Marc P. Cook, Esq.
Nevada Bar No. 4574
517 S. 9th St.
Las Vegas, Nevada 89101

ORDER

The Court having reviewed the foregoing **STIPULATION AND ORDER TO EXTEND THE TIME FOR PLAINTIFF TO RESPOND TO DEFENDANTS' MOTION TO DISMISS** in the above-entitled matter and for good cause appearing therefor,

IT IS SO ORDERED that the Response to Defendants' Motions to Dismiss shall be due on June 21, 2019.

IT IS SO ORDERED that the Reply to the Response to Defendants' Motions to Dismiss shall be due on July 12, 2019.

DATED this 10 day of June, 2019.

Gloria M. Navarro, Chief Judge
UNITED STATES DISTRICT COURT